

# Exhibit A

<b>FRANCESCA VIOLA</b>	:	UNITED STATUS DISTRICT COURT
	:	OF MASSACHUSETTS
<i>Plaintiff</i>	:	
	:	
v.	:	CASE NO. 21-CV-10426-LTS
	:	
<b>HARVARD CORPORATION, ET AL</b>	:	
	:	
<i>Defendants</i>	:	

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I, Jeannette M. Cutshaw, being first duly sworn, depose as follows:

1. I am over eighteen years of age, a resident of the state of Florida, competent to testify, and have personal knowledge of the facts and matters set forth herein unless otherwise stated.
2. I am Licensed Marriage and Family Therapist who treated the Plaintiff in the above captioned matter, Francesca Viola, in Pennsylvania, from approximately February 2015 through June 2020.
3. In the fall of 2018, Ms. Viola traveled to Rome, Italy to teach classes for her employer Temple University. During that time, I spoke with Ms. Viola several times through video calls using the WhatsApp platform. Those sessions are referenced in my invoices to Ms. Viola for that time period. I do not have written notes for those WhatsApp sessions.
4. In December, 2020, I relocated to Florida. After the move, the patient chart I maintained pertaining to Ms. Viola was stored in a box in my home. Some of the records from Ms. Viola's chart in this box were subsequently accidentally destroyed.
5. In July 2022, I received a HIPAA Compliant Authorization Form for the Release of Psychotherapy notes which was signed by Ms. Viola and instructed me to release her treatment records to her counsel. In response to that request, I provided counsel for Ms. Viola with Ms. Viola's chart which included all of the remaining records I had pertaining to Ms. Viola.
6. I do not have any additional records reflecting my treatment of Ms. Viola.

AFFIANT SAYETH FURTHER NAUGHT

I declare under penalty of perjury that the foregoing is true and correct. Signed on the 21<sup>st</sup> day of September, 2022.

  
\_\_\_\_\_  
Jeannette M. Cutshaw

Subscribed and sworn to (or affirmed) before me on this 21<sup>st</sup> day of SEPT, 2022.

  
\_\_\_\_\_  
Notary Public

